



Texaco Exploration and Production Inc.
Unitization Department
P. O. Box 60252
New Orleans, Louisiana 70160

March 19, 2001

Hon. Philip N. Asprodites, Commissioner
Department of Natural Resources
Office of Conservation
P. O. Box 94275 - Capitol Station
Baton Rouge, Louisiana 70804-9275

Dear Sir:

MVP Production Inc. (MVP) requests the calling of a public hearing, after due legal notice, to consider the following matters pertaining to the Lower 9000 Foot Sand, Reservoir C-3, in the Paradis Field, St. Charles Parish, Louisiana.

1. To establish rules and regulations governing the exploration for and production of gas and condensate from the above sand.
2. To establish a single drilling and production unit for the above sand.
3. To force pool and integrate all separately owned tracts and mineral leases and other mineral interests within the unit.
4. To designate MVP Production Inc. as operator of the L 9000 RC-3 SUA.
5. To designate MVP's Robert E. Sims Well No. 1 as the unit well for the L 9000 RC-3 SUA.
6. To provide that any future replacement and/or alternate wells for said unit shall be exempt from the spacing provisions of Statewide Order No. 29-E.
7. To provide for future reclassification of the reservoir without the necessity of a public hearing if such reclassification becomes necessary due to a change in production characteristics.
8. To consider such other matters as the Commissioner may deem pertinent.

The Lower 9000 Foot Sand, Reservoir C-3, in Paradis Field is hereby defined as being that gas and condensate bearing sand encountered between the electric log depths of 8,986 (-8,889 TVD SS) feet and 9,050 (-8,951 TVD SS) feet in the MVP Production Inc. - Robert E. Sims Well No. 1, located in Section 39, Township 14 South, Range 20 East, St. Charles Parish, Louisiana.

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MVP WILL PROVIDE FOR THE ADVERTISEMENT OF THE LEGAL NOTICE IN A NEWSPAPER OF GENERAL CIRCULATION IN THE VICINITY OF THE PARADIS FIELD, AND ALSO WILL POST THE LEGAL NOTICE AND UNIT PLAT IN A PROMINENT PLACE IN THE AREA OF THE FIELD. MVP WILL ALSO MAIL A COPY OF SAID LEGAL NOTICE AND UNIT PLAT TO INTERESTED OWNERS, REPRESENTED PARTIES AND TO INTERESTED PARTIES.

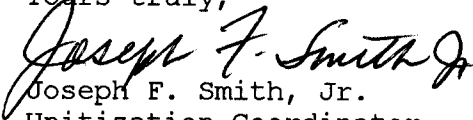
Attached are (1) a copy of the revised unit plat, (2) a list of Interested Owners, Represented Parties, and Interested Parties, (3) a list of the attendees of the Pre-application conference, and (4) our check in the amount of \$700.00 to cover the application fee.

A copy of this application, plat and list attached, is being sent to Mr. Richard D. Hudson, District Manager, Lafayette, Louisiana. A copy of this application and plat are also being sent to each Interested Owner, Represented Party, and Interested Party after a reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

The pre-application conference was held on March 15, 2001, as per our notice of February 22, 2001. The conference began with Texaco representatives explaining the basis for the size and configuration of the unit being proposed. After a short question and answer period, the meeting was opened to afford anyone the opportunity to present a counterplan. Mr. Bruce Bahlinger, representing Watson Energy, suggested a revision to the original unit proposal. Texaco agreed to make the revision and the revised unit plat is attached to this application. No other counterplans were presented, therefore Texaco expects no opposition at the hearing.

All pertinent data relating to this notice can be obtained, at the cost of the requesting party, by contacting the undersigned at Texaco Exploration and Production Inc., P. O. Box 60252, New Orleans, Louisiana 70160, telephone number (504) 680-1004.

Yours truly,


Joseph F. Smith, Jr.
Unitization Coordinator

JFSmith:PARL9000RC-3SUA

Attachments

cc: Mr. Richard D. Hudson, District Manager
Department of Natural Resources
Office of Conservation
Lafayette, Louisiana

Interested Owners, Represented Parties and Interested Parties

R 20 E

SEC 39

LOUISIANA LAND & EXPLORATION CO.
TEXACO LS.

IRELAND TEXACO FEE

L 9000 RC-3 SUA
ROBERT E. SIMS Well No. 1
± 19.15 Acres

LL&E-PARADIS
68
12200

WATSON ENERGY LLC
TEXAS & NEW ORLEANS RAILROAD

MANUFACTURER'S RECORD PUBLISHING CO.
LLOG EXPLORATION COMPANY, INC. LS.

3-DALT
FORCENERGY INC
11200
2 STI
LLOG EXPL CO
10936
10400

Fault 'A-1'
Gas
Water
Contact

MVP
ROBERT E. SIMS
11100

MVP
ROBERT E. SIMS
11230

ROBERT E. SIMS
TEXACO LS.

SUNSET RLTY
11777

SR&P CEMETERY
TEXACO LS.

SARAH SIMS MALLORY
AMERADA PET. CORP. LS.

M. V. P. PRODUCTION INC
MALLORY; 9900 NAG RA SUM
10490

ALFERD SUMLER
TEXACO FEE

JAMES BRANCH ET AL
TEXACO LS.

EDWARD DANIEL ET AL

TEXACO OIL
EDWARD DANIELL
10490

SOLOMON SUMLER ET AL
TEXACO LS

JAMES BRANCH ET AL
TEXACO LS.

JAMES BRANCH ET AL
TEXACO LS.

BRANCH JAMES
11014

T
14
S

TEXACO OIL
SR&P
12
10490

IRELAND TEXACO FEE



MVP PRODUCTION INC.
UNITIZATION DEPARTMENT



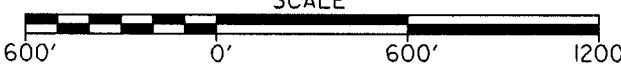
PARADIS FIELD
ST. CHARLES PH., LA.

L 9000 RC-3 SUA

ENGINEER: J.F. SMITH JR.

DATE: REV. MAR. 2001

SCALE



- Proposed Unit Well
- △ Geologically Significant Well

HEIRS OF GABE LEWIS